

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

MARCUS WALKER #374618,

Plaintiff,

NO. 2:21-cv-12874

v

HON. DENISE PAGE HOOD

DR. MARY GREINER, *et al.*,

MAG. PATRICIA T. MORRIS

Defendants.

Exhibit A

Plaintiff's Interrogatories to
Defendant Mary Velarde
and
Plaintiff's Production Requests to
Defendant Mary Velarde
(Received DOAG on March 2, 2023)

Marcus Walker #374618
Plaintiff in Pro Per
Gus Harrison Correctional Facility
2727 E Beecher Street
Adrian, MI 49221

February 24, 2023

Clerk of the Court
U.S. District Court
Eastern District of Michigan
Theodore Levin U.S. Courthouse
231 West Lafayette Blvd.
Detroit, MI 48226

Re: Case No.: 2:21-cv-12874

Dear Clerk:

Enclosed you will find the following documents to be filed in your court: Letter requesting subpoenas; Plaintiff's Answer And Objections To Defendants Rickey Coleman, D.O., Keith Papendick, M.D., Vivien Dorsey, M.D., Rosilyn Jindal, P.A., And Kaelynn Pfeil's First Set Of Interrogatories And Request For Production Of Documents From Plaintiff; Plaintiff's Interrogatories To Defendant Rosilyn Jean Jindal; Plaintiff's Interrogatories For Defendant Keith Papendick And Request For Production Of Documents; Plaintiff's Production Requests To Defendant Rosilyn Jean Jindal; Plaintiff's Interrogatories To Defendant Mary Velarde; and Plaintiff's Production Requests To Defendant Mary Velarde.

Thank you in advance for your time and consideration in this matter.

Marcus J. Walker #374618
Marcus Walker #374618

cc: file

✓ Alan J. Soros
Chapman Law Group

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

MARCUS WALKER
Plaintiff,

v.

DR. MARY GREINER, et.al.,
Defendants.

No. 2:21-cv-12874
Hon. Denise Page Hood
Mag. Patricia T. Morris

Marcus Walker #374618
In Pro Per
Gus Harrison Corr. Fac.
2727 East Beecher Street
Adrian, MI 49221

Allan J. Soros (P43702)
Assistant Attorney General
Michigan Dept. of Atty. Gen.
Corrections Division
P.O. Box 30217
Lansing, MI 48909
(517) 335-3055

Chapman Law Group
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Jonathan C. Lanesky (P59740)
Attorneys for Rickey Coleman,
D.O., Keith Papendick, M.D.,
Vivien Dorsey, M.D., Rosilyn
Jindal, P.A. and Kaelyn Pfeil
1441 W. Long Lake Rd, Ste 310
Troy, MI 48098
(248) 644-6326

PLAINTIFF'S INTERROGATORIES TO
DEFENDANT MARY VELARDE

To: Defendant Mary Velarde

NOW COMES, Plaintiff Marcus Walker #374618, in pro se, and makes this request under Rule 33 and Rule 26(b)(1) of the Federal Rules of Civil Procedure that Defendant Mary Velarde answer the following interrogatories and serve her answers upon Plaintiff within thirty (30) days after receipt of these interrogatories.

After exercising due diligence to secure information, if Defendant is unable to answer any or all of the following interrogatories, in part or whole, Defendant is required under Fed. R. Civ. P. 33(b)(3)-

(4) to explain her inability to answer in part or whole, while nevertheless answering to the extent possible.

Interrogatory No. 1: Please describe, with specific detail, the nature, extent, powers, and duties of your employment position with the Gus Harrison Correctional Facility [hereinafter, "ARF"].

Interrogatory No. 2: Please provide the name, office and title, telephone number and address, of all persons delegated to perform the specific duties entrusted to or entailed in the position of ARF Registered Nurse. Include in your answer a description of each delegated duty.

Interrogatory No. 3: Please provide the protocol of answering medical kites and for prisoners to write specifically to the H.U.M., the Physician Assistant, the Medical Provider, or Doctor, in order to attempt to resolve any medical problem during the time period of January 1, 2018 to February 19, 2023. Why would a rejection of forwarding the request to any of the above be rejected and not processed?

Interrogatory No. 4: Please provide, to the extent of Defendant's knowledge and ability to secure, the name, office and title, telephone number and address of all persons having knowledge pertaining to the facts alleged in Plaintiff's Complaint and the defense and factual assertions in Defendant's Answer; include in your answer a specific description of the nature of that knowledge.

Dated this 24 day of February 2023

Marcus G. Walker #374618

Marcus Walker #374618

Prisoner Name: Marcus L. Walker

Prisoner Number: 374618

(☒) GUS HARRISON CORRECTIONAL FACILITY
(☐) ~~PARTHON HAWAII CORRECTIONAL FACILITY~~

2727 E. Beecher St.
Adrian, MI 49221

ATTORNEY GENERAL
CORRECTIONS DIVISION

MAR 02 2023

ASSIGNED TO:

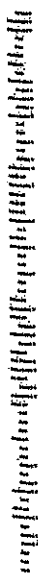
Allen J. Sorens
Michigan Department of Attorney General
Correction Division P.O. Box 30217
Lansing, Michigan 48909

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Plaintiff,

v.

DR. MARY GREINER, et.al.,
Defendants.

No. 2:21-cv-12874
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Attorneys for Rickey Coleman,
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Jindal, P.A. and Kaelyn Pfeil
1441 W. Long Lake Rd, Ste 310
Troy, MI 48098
(248) 644-6326

PLAINTIFF'S PRODUCTION REQUESTS
TO DEFENDANT MARY VELARDE

NOW COMES, Marcus Walker #374618, plaintiff in pro se, and makes this request under Rule 34 and 26(b)(1) of the Federal Rules of Civil Procedure that Defendant Mary Velarde produce for copying and/or inspection the below-requested documents and/or tangible things. Production must be made within thirty (30) days after receiving this production request.

After exercising due diligence to secure documents and/or tangible things, if Defendant is unable to comply with any or all of the following production requests, in part or whole; Defendant is required under Fed. R. Civ. P. 34(b)(2)(B-D) to explain her inability to comply in part

or whole, while nevertheless producing documents and/or tangible things to the extent possible.

Production Request No. 1: Please provide copies of, or make available for inspection and copying, Plaintiff's ARF medical records and medical kites and their response to the medical kites.

Production Request No. 2: Please provide copies of, or make available for inspection and copying, all documents on record with the ARF Medical and ARF Grievance Coordinator, that have been filed against Defendant Mary Velarde.

Production Request No. 3: Please provide copies of, or make available for inspection and copying, all documents on record with the ARF Medical bearing Plaintiff's name, physical description, date of birth, social security number, or any other identifier, or otherwise pertaining to Plaintiff.

Production Request No. 4: Please provide copies of, or make available for inspection and copying, all documents of Plaintiff's offsite visits for medical purposes; please be sure of the dates, times, and facilities Plaintiff was taken to.

Production Request No. 5: Please provide copies, or make available for inspection and/or copying, any and all documents, photo, recordings, or other tangible things pertaining to the facts alleged in Plaintiff's Complaint and defenses and factual assertions in Defendant's Answer.

Dated this 24 day of February 2023

Marcus S. Walker #374618

Marcus Walker #374618

Certificate of Service

I, Marcus Walker, hereby certify that I have caused to served to the below-named true and correct copies of the foregoing document via the ARF prison mail service and U.S. Postal Service.

Michigan Dept. of Attorney General
Alan J. Soros (P43702)
Attorney for MDOC Defendants
P.O. Box 30217
Lansing, MI 48909
(517) 335-3055

Dated this 24 day of February, 2023

Marcus S. Walker #374618
Marcus Walker #374618

Prisoner Name: Marcus L. Walker

Prisoner Number: 374618

(☒) GUS HARRISON CORRECTIONAL FACILITY
(☒) ~~PARTHAWAY CORRECTIONAL FACILITY~~

2727 E. Beecher St.
Adrian, MI 49221

ATTORNEY GENERAL
CORRECTIONS DIVISION

MAR 02 2023

ASSIGNED TO:

Allen J. Sorens
Michigan Department of Attorney General
Correction Division P.O. Box 30217
Lansing, Michigan 48909

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